

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

ANDREW JAMES MCGONIGLE, on  
behalf of himself and others similarly  
situated,

Plaintiff,

v.

TRANSFORM SR BRANDS LLC,

Defendant.

Case No. 1:25-cv-01674-SRH

Hon. Sunil R. Harjani

Oral Argument Requested

Electronically Submitted

**DECLARATION OF BECCA J. WAHLQUIST**

I, Becca J. Wahlquist, declare as follows:

1. I am a member of the Bar of the State of California and am a Partner with the law firm Kelley Drye & Warren LLP.
2. I submit this declaration in support of Defendant Transform SR Brands LLC's ("Defendant" or "Transform") Motion to Dismiss or, in the Alternative, to Stay Proceedings.
3. Attached hereto as **Exhibit A** is an true and correct copy of a redline showing all changes between Plaintiff's Complaint (Dkt. 1) and Plaintiff's Amended Complaint (Dkt. 13).
4. Pursuant to this Court's Case Procedures, also attached to this Declaration are all cited authorities that that are not available on Westlaw.
5. Attached hereto as **Exhibit B** is a true and correct copy of the Complaint in *McGonigle v. Zales Delaware Inc.*, No. 1:24-cv-01820 (E.D. Va.), dated October 15, 2024.

6. Attached hereto as **Exhibit C** is a true and correct copy of the Complaint in *McGonigle v. Value City Furniture, Inc.*, No. 2:24-cv-04293 (S.D. Ohio), dated December 23, 2024.

7. Attached hereto as **Exhibit D** is a is a true and correct copy of the Amended Complaint in *McGonigle v. FTD, LLC*, No. 1:24-cv-12201 (N.D. Ill.), dated February 23, 2025.

8. Attached hereto as **Exhibit E** is a true and correct copy of the Amended Complaint in *McGonigle v. Alliance Entertainment, LLC*, No. 0:24-cv-62443 (S.D. Fla.), dated May 6, 2025.

9. Attached hereto as **Exhibit F** is a true and correct copy of an excerpt of the Webster's Third New International Dictionary, including its definition of "residential," as published in 1993.

10. Attached hereto as **Exhibit G** is a true and correct copy of a statement issued by Senator Lloyd Bentsen regarding the TCPA, 137 Cong. Rec. 30824 (1991), dated November 7, 1991.

11. Attached hereto as **Exhibit H** is a true and correct copy of an order staying proceedings in *Shelton v. Pro Source Lending Group LLC*, No. 2:24-cv-04394, Dkt. 33 (E.D. Pa.), dated April 14, 2025.

12. Attached hereto as **Exhibit I** is a true and correct copy of an order staying proceedings in *Schultz v. AMB Media, LLC*, No. 1:24-cv-04725, Dkt. 17 (N.D. Ga.), dated December 17, 2024.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on June 10, 2025

  
BECCA J. WAHLQUIST